

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

FILED
CHARLOTTE, N. C.

OCT 14 1993

U. S. DISTRICT COURT
W. DIST. OF N. C.

UNITED STATES OF AMERICA)	DOCKET NO. 3:93CR217-mu
)	
v.)	<u>BILL OF INDICTMENT</u>
)	
TIMOTHY ANTHONY MOORE,)	Vio: Title 21, U.S.C.,
aka Tim Allison)	§§846 and 841(a)(1)
JOHN WAYNE JOHNSON)	
MARVIN MARCELL YOUNG)	Title 18, U.S.C.,
JOHNNY TROYVOYDE COLEMAN,)	§§924(c)(1); 922(g)(1);
aka Koolaid)	and 2
PARRIS LAVINIA MOSS)	
_____)	

THE GRAND JURY CHARGES:

COUNT ONE

From on or about January, 1989 through the present, in Mecklenburg County, within the Western District of North Carolina and elsewhere,

TIMOTHY ANTHONY MOORE, aka Tim Allison
JOHN WAYNE JOHNSON
MARVIN MARCELL YOUNG
JOHNNY TROYVOYDE COLEMAN, aka Koolaid
PARRIS LAVINIA MOSS

did knowingly, willfully and unlawfully combine, conspire, confederate and agree with one another and others, both known and unknown to the Grand Jury, to possess with intent to distribute, and to distribute, a quantity of cocaine base, a Schedule II narcotic controlled substance, a violation of Title 21, United States Code, Section 841(a)(1), and during the course and in furtherance of the conspiracy, a member of the conspiracy did commit or cause to be committed, within the Western District of North Carolina, at least one overt act in furtherance of the conspiracy, a violation of Title 21, United States Code, Section 846.

COUNT TWO

On or about October 22, 1991, in Mecklenburg County, within the Western District of North Carolina,

TIMOTHY ANTHONY MOORE, aka Tim Allison
JOHN WAYNE JOHNSON

USA v. TIMOTHY ANTHONY MOORE, et al.
(3:93CR217)

during and in relation to a drug trafficking crime, to wit: conspiracy to possess with intent to distribute cocaine base, for which he may be prosecuted in a court of the United States, did knowingly use and carry a firearm, and did aid and abet one another and others in the knowingly using and carrying of firearms, in violation of Title 18, United States Code, Sections 924(c)(1) and 2.

COUNT THREE

On or about April 27, 1993, in Mecklenburg County, within the Western District of North Carolina,

TIMOTHY ANTHONY MOORE, aka Tim Allison
JOHN WAYNE JOHNSON
MARVIN MARCELL YOUNG

did knowingly, willfully and unlawfully possess with intent to distribute, and did aid and abet others with possession with intent to distribute, a quantity of cocaine base, a Schedule II narcotic controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT FOUR

On or about May 4, 1993, in Mecklenburg County, within the Western District of North Carolina,

JOHNNY TROYVOYDE COLEMAN, aka Koolaid
PARRIS LAVINIA MOSS

did knowingly, willfully and unlawfully possess with intent to distribute, and did aid and abet others with possession with intent to distribute, a quantity of cocaine base, a Schedule II narcotic controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT FIVE

On or about May 4, 1993, in Mecklenburg County, within the Western District of North Carolina,

USA v. TIMOTHY ANTHONY MOORE, et al.
(3:93CR217)

JOHNNY TROYVOYDE COLEMAN, aka Koolaid
PARRIS LAVINIA MOSS

during and in relation to a drug trafficking crime for which they may be prosecuted in a court of the United States, to wit: conspiracy to possess with intent to distribute cocaine base, did knowingly use and carry firearms, and did aid and abet one another in the use and carrying of such firearms, to wit, one or more of the following: a sawed-off, New England .410 gauge shotgun, a Mossberg 12 gauge, pistol grip shotgun, a Bersa .380 caliber, semi-automatic pistol, an Intratec .22 caliber semi-automatic pistol, a Worcester .38 caliber revolver, and a Ruko-Arms M-16 .223 caliber rifle, in violation of Title 18, United States Code, Sections 924(c)(1) and 2.

COUNT SIX

In or about August, 1992, in Mecklenburg County, within the Western District of North Carolina,

TIMOTHY ANTHONY MOORE, aka Tim Allison

during and in relation to a drug trafficking crime, to wit: conspiracy to possess with intent to distribute cocaine base, for which he may be prosecuted in a court of the United States, did knowingly use and carry a firearm, in violation of Title 18, United States Code, Sections 924(c)(1).

COUNT SEVEN

In or about August, 1992, in Mecklenburg County, within the Western District of North Carolina,

TIMOTHY ANTHONY MOORE, aka Tim Allison

during and in relation to a drug trafficking crime, to wit: conspiracy to possess with intent to distribute cocaine base, for which he may be prosecuted in a court of the United States, did knowingly use and carry a firearm, in violation of Title 18, United States Code, Sections 924(c)(1).

USA v. TIMOTHY ANTHONY MOORE, et al.
(3:93CR217)

COUNT EIGHT

In or about January, 1993, in Mecklenburg County, within the Western District of North Carolina,

TIMOTHY ANTHONY MOORE, aka Tim Allison
JOHN WAYNE JOHNSON
MARVIN MARCELL YOUNG

during and in relation to a drug trafficking crime, to wit: conspiracy to possess with intent to distribute cocaine base, for which he may be prosecuted in a court of the United States, did knowingly use and carry a firearm, and did aid and abet one another and others in the knowingly using and carrying of firearms, in violation of Title 18, United States Code, Sections 924(c)(1) and 2.

COUNT NINE

Between the dates of March 1, 1993 and April 30, 1993 in Mecklenburg County, within the Western District of North Carolina,

TIMOTHY ANTHONY MOORE, aka Tim Allison
JOHN WAYNE JOHNSON
MARVIN MARCELL YOUNG

during and in relation to a drug trafficking crime, to wit: conspiracy to possess with intent to distribute cocaine base, for which they may be prosecuted in a court of the United States, did knowingly use and carry a firearm, and did aid and abet one another and others in the knowingly using and carrying of firearms, in violation of Title 18, United States Code, Sections 924(c)(1) and 2.

COUNT TEN

On or about June 19, 1993, in Mecklenburg County, within the Western District of North Carolina,

TIMOTHY ANTHONY MOORE, aka Tim Allison

during and in relation to a drug trafficking crime, to wit: conspiracy to possess with intent to distribute cocaine base, for which he may be prosecuted in a court of the United States, did

USA v. TIMOTHY ANTHONY MOORE, et al.
(3:93CR217)

knowingly use and carry a firearm, in violation of Title 18, United States Code, Section 924(c)(1).

COUNTS ELEVEN AND TWELVE

On or about April 20, 1993, in Mecklenburg County, within the Western District of North Carolina,

MARVIN MARCELL YOUNG

having been previously convicted on September 8, 1992, of a crime punishable by imprisonment for a term exceeding one year, that is, possession with intent to sell and deliver cocaine, in the General Court of Justice, Superior Court Division, Mecklenburg County, North Carolina, did knowingly, willfully and unlawfully possess a firearm in and affecting interstate commerce, that is, one or more of the firearms listed below, all in violation of Title 18, United States Code, Sections 922(g)(1) and 924.

COUNTS

ELEVEN

TWELVE

FIREARM

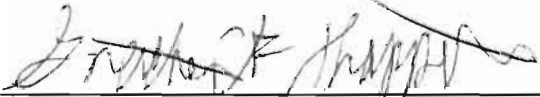
Ruger .357 caliber revolver

Taurus .357 caliber revolver

A TRUE BILL:


FOREMAN

JERRY W. MILLER
UNITED STATES ATTORNEY


GRETCHEN C. F. SHAPPERT
ASSISTANT UNITED STATES ATTORNEY